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Attorney for Defendant
B & B Management Group, LLC,
dba Bellach's Leather for Living

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SUSAN SANDELMAN, AS TRUSTEE
OF THE ESAN TRUST,

Plaintiff,

v.

B&B PROPERTY MANAGEMENT, LLC,
dba BELLACH'S LEATHER FOR LIVING,

Defendant.

No. CV 08-00681 HRL

NOTICE OF MOTION AND MOTION
FOR ORDER AUTHORIZING THE
WITHDRAWAL OF COUNSEL FOR THE
DEFENDANT, B & B MANAGEMENT
GROUP, dba BELLACH'S LEATHER FOR
LIVING, erroneously sued herein as B&B
Property Management, LLC, dba Bellach's
Leather for Living

Complaint Filed: January 29, 2008
Assigned Judge: Hon. Howard R. Lloyd

Motion Date: August 12, 2008
Time: 10:00 a.m.
Courtroom: 2

TO: B & B MANAGEMENT GROUP, LLC and JEROME BELLACH, MANAGING
MEMBER, AND ALL OTHER PARTIES IN INTEREST:

PLEASE TAKE NOTICE that on August 12, 2008, at 10:00 a.m., or as soon thereafter as
the matter may heard in Courtroom 2 of the above entitled Court, located at 280 First Street, San
Jose, California 95113, the attorney of record for the defendant, Mikel D. Bryan, P.C. ("the
moving party") will, and hereby does, move the Court for an Order Authorizing the Withdrawal
of the moving party, as the attorney of record for the defendant, B & B Management Group,
LLC, dba Bellach's Leather for Living, erroneously sued herein as B&B Property Management,
LLC, dba Bellach's Leather for Living ("B & B").

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1 This motion is brought on the grounds that certain irreconcilable differences have arisen
2 between the managing member of the defendant limited liability company and the moving party,
3 and the moving party cannot continue to represent said defendant in this matter.

4 As part of this Motion, the defendant, B & B, and its managing member, Jerome Bellach,
5 are advised as follows:

6 **UPON WITHDRAWAL, THE MOVING PARTY WILL NO LONGER BE**
7 **REPRESENTING THE LIMITED LIABILITY COMPANY IN THIS ACTION AS ITS**
8 **ATTORNEY. AS A LIMITED LIABILITY COMPANY, B & B MANAGEMENT**
9 **GROUP, LLC, WILL NOT BE ALLOWED TO APPEAR BEFORE THIS COURT**
10 **EXCEPT THROUGH AN ATTORNEY AUTHORIZED TO PRACTICE LAW BEFORE**
11 **THE COURT. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE REGARDING**
12 **LEGAL REPRESENTATION. YOUR FAILURE TO OBTAIN AN ATTORNEY MAY**
13 **LEAD TO AN ORDER STRIKING THE PLEADINGS AND/OR ENTRY OF DEFAULTS**
14 **OR DEFAULT JUDGMENTS AGAINST THE LIMITED LIABILITY COMPANY.**

15 A copy of this Motion and Supporting Declaration have been served by mail to the
16 limited liability company's business address in care of Jerome Bellach, the managing member, at
17 the address confirmed in telephone conversation with Mr. Bellach as being current.

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19 DATED: JULY 7, 2008

MIKEL D. BRYAN, P.C.

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MIKEL D. BRYAN
22 Attorney for Defendant, B & B Management
Group, LLC
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